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October 20, 2023

Via ECF

Honorable Laura T. Swain
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

***Re: United States v. Gleen Anciro,
21-Cr-592-2 (LTS)***

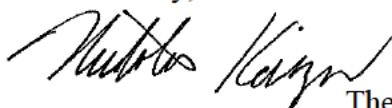
Dear Chief Judge Swain:

I represent Ms. Anciro in the above-captioned case. I am writing the Court on an **emergency basis** —and with the Government's consent — requesting that Ms. Anciro's conditions of pre-trial release be temporarily modified to permit her to travel to the Philippines for one month as her mother, who lives there, suffered a hemorrhagic stroke that she may not recover from. While in the Philippines, Ms. Anciro would reside with her sister, in Quezon City, which is a suburb just north of Manila (the capital city).

Should the Court authorize this modification, we'd also request that pre-trial be authorized to **immediately** release Ms. Anciro's passport to her (or undersigned counsel). The date of Ms. Anciro's departure is dependent on when the passport is released because her passport has since expired and Ms. Anciro will have to seek an emergency renewal before she can travel.

Ms. Anciro is currently out on a \$250,000 bond, secured by her husband and daughter. She would travel to the Philippines alone. Undersigned counsel will retain Ms. Anciro's husband and daughter's passport.

Sincerely,



Nicholas G. Kaizer

Cc: AUSA Timothy Capozzi (via ECF and e-mail)

The foregoing request for modification of Ms. Anciro's pretrial release conditions to permit **immediate** release of her passport and allow for travel to the Philippines is granted. DE#235 resolved.

SO ORDERED

October 20, 2023

/s/ Laura Taylor Swain, Chief USDJ